



State of Ohio Environmental Protection Agency

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FERNALD

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George V. Voinovich
Governor

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May 12, 2000

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: 90% EPLTS DESIGN

Dear Mr. Reising:

The design package for the Enhanced Permanent Leachate Transmission System (EPLTS) 90% design was submitted to the Ohio Environmental Protection Agency directly by Fluor Fernald and not under the more typical DOE cover letter bearing your signature. It is our understanding that a sub-contract has been issued for the construction of the EPLTS and that notice to proceed is expected soon.

Before Ohio EPA will be able to approve the final design of the EPLTS, the following conditions must be met:

- 1) Infrastructure elements which allow for the "cascade flow" of leachate through the secondary containment pipe in the event of a catastrophic failure of the primary carrier pipe should be removed from the design.
We have determined that this design does not comply with OAC 3745-27-08(C)(5)(c) which has been cited as an ARAR in both the Operable Unit 2 and Operable Unit 5 Records of Decision. OAC 3745-27-08(C)(5)(c) requires that leachate lines be double cased. In the event of failure of the primary containment pipe, the design would allow flow in all sections of the EPLTS that are down-gradient of the failure to be in a single-contained pipe. In this case, all valve houses would be used to carry leachate and would also be single-contained. The change we are asking would result in single-contained flow only in the length of pipe in which the failure occurs; flow in subsequent down-gradient runs would be in double-cased pipe and the valve houses would not contain leachate.

The circular hole placed in the top of the container pipe at the down gradient ends of piping runs between the various valve houses should be removed. Fixed-end seals at the up gradient ends of the piping runs should be added. It is our understanding that these changes will require the addition of "weep holes" in

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the new fixed-end seals.

- 2) Procedures for the step-wise routing of leachate flow from the interim system to the EPLTS as should be developed. These procedure should detail sequencing of connections, contingencies for managing leachate when flows through the LCS lines must be stopped to allow for construction, etc.
- 3) Prior to operation/final inter-connection of the EPLTS, a systems plan should be submitted to Ohio EPA for review and approval. The system plan should detail the operation of the system.
- 4) Prior to operation/final inter-connection of the EPLTS, a leachate management contingency plan should be submitted to Ohio EPA for review and approval. The contingency plan is required by OAC 3745-27-19(K)(6) which is cited as an ARAR in the Operable Unit 2 ROD.

Construction should not proceed prior to Ohio EPA approval on the DCNs that enable the changes we requested in 1 and 2.

Operations/final inter-connection may begin after Ohio EPA has approved the plans specified inn 3 and 4.

If you have any questions, please contact Tom Ontko or me.

Sincerely,



Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.